

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

Index No.:

-----X  
YULONDA HOPSON,

Plaintiff,

-against-

QED RESOURCES INC., Q.E.D. RESOURCES, LTD.  
and ROBERT WEINER,

Defendants.  
-----X

## SUMMONS

Plaintiff designates Bronx  
County as the place of trial.

The basis of venue is:  
Plaintiff's residence

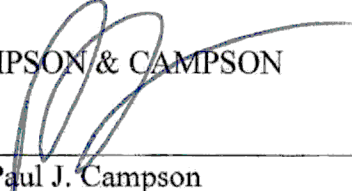
Plaintiff resides at:  
689 Melrose Avenue, Apt. 25  
Bronx, NY 10455

### To the above named Defendants:

**You are hereby summoned** to answer the Complaint in this action, and to serve a copy of your Answer, or, if the Complaint is not served with this Summons, to serve a Notice of Appearance on the Plaintiffs' attorneys within twenty days after the service of this Summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Complaint.

Dated: New York, New York  
September 4, 2019

CAMPSON & CAMPSON

By:   
Attorneys for Plaintiff  
25 West 43<sup>rd</sup> Street, Suite 711  
New York, NY 10036  
(212) 302-1180

TO: QED RESOURCES INC.  
c/o Adler & Gross, P.C.  
15 Park Row  
New York, NY 10038

Q.E.D. RESOURCES, LTD.

c/o Steven Kalinsky

39 West 55<sup>th</sup> Street

New York, NY 10019

ROBERT WEINER

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

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YULONDA HOPSON,

Plaintiff,

- against -

QED RESOURCES INC., Q.E.D. RESOURCES, LTD.  
and ROBERT WEINER,

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Index No.

**VERIFIED  
COMPLAINT**

Plaintiff, by her attorneys, **CAMPSON & CAMPSON**, as and for a Verified Complaint,  
respectfully set forth and allege:

**AS AND FOR A FIRST CAUSE OF ACTION**

1. At the time of the commencement of this action, Plaintiff resided in the County of  
Bronx, State of New York.

2. This action falls within one or more of the exemptions set forth in CPLR §1602,  
including but not limited to subsections 1, 2, 5, 7 and/or 11.

3. At the time of the commencement of this action, Defendant QED RESOURCES  
INC. was and is a domestic corporation duly licensed and enfranchised to conduct business  
under the laws of the State of New York.

4. That at all times hereinafter mentioned, Defendant QED RESOURCES INC.  
was and still is a foreign corporation authorized to do business within the State of New York.

5. At the time of the commencement of this action, Defendant Q.E.D.  
RESOURCES, LTD. was and is a domestic limited company duly licensed and enfranchised to  
conduct business under the laws of the State of New York.

6. That at all times hereinafter mentioned, Defendant Q.E.D. RESOURCES, LTD.

was and still is a foreign limited company authorized to do business within the State of New York.

7. At all times hereinafter mentioned, Defendant ROBERT WEINER is a resident of the County of Rockland, State of New York.

8. At all times hereinafter mentioned, there existed a premises located at 32 Broadway, in the City, County and State of New York (hereinafter "the premises").

9. At all times hereinafter mentioned, Defendant QED RESOURCES INC. owned the aforementioned premises.

10. At all times hereinafter mentioned, Defendant QED RESOURCES INC. leased an office known as Suite 1800 at the aforementioned premises.

11. At all times hereinafter mentioned, Defendant QED RESOURCES INC. operated the office suite at the aforementioned premises.

12. At all times hereinafter mentioned, Defendant QED RESOURCES INC. managed the office suite at the aforementioned premises.

13. At all times hereinafter mentioned, Defendant QED RESOURCES INC. maintained the office suite at the aforementioned premises.

14. At all times hereinafter mentioned, Defendant QED RESOURCES INC. controlled the office suite at the aforementioned premises.

15. At all times hereinafter mentioned, Defendant QED RESOURCES INC. supervised its employees in the office suite at the aforementioned premises.

16. At all times hereinafter mentioned, Defendant QED RESOURCES INC. had a duty to take reasonable steps to supervise, monitor and oversee the employees and other patrons at the premises.

17. At all times hereinafter mentioned, it was the duty of Defendant QED RESOURCES INC. to take reasonable steps to protect the safety of their employees and other patrons at their office, namely the Plaintiff.

18. That at all times hereinafter mentioned, Defendant QED RESOURCES INC. had a duty to provide security and maintain the safety of their office at the premises.

19. That at all times hereinafter mentioned, Defendant ROBERT WEINER was an employee of QED RESOURCES INC.

20. At all times hereinafter mentioned, Defendant Q.E.D. RESOURCES, LTD. owned the aforementioned premises.

21. At all times hereinafter mentioned, Defendant Q.E.D. RESOURCES, LTD. leased an office known as Suite 1800 at the aforementioned premises.

22. At all times hereinafter mentioned, Defendant Q.E.D. RESOURCES, LTD. operated the office suite at the aforementioned premises.

23. At all times hereinafter mentioned, Defendant Q.E.D. RESOURCES, LTD. managed the office suite at the aforementioned premises.

24. At all times hereinafter mentioned, Defendant Q.E.D. RESOURCES, LTD. maintained the office suite at the aforementioned premises.

25. At all times hereinafter mentioned, Defendant Q.E.D. RESOURCES, LTD. controlled the office suite at the aforementioned premises.

26. At all times hereinafter mentioned, Defendant Q.E.D. RESOURCES, LTD. supervised its employees in the office suite at the aforementioned premises.

27. At all times hereinafter mentioned, Defendant Q.E.D. RESOURCES, LTD. had a duty to take reasonable steps to supervise, monitor and oversee the employees and other patrons

at the premises.

28. At all times hereinafter mentioned, it was the duty of Defendant Q.E.D. RESOURCES, LTD. to take reasonable steps to protect the safety of their employees and other patron at their office, namely the Plaintiff.

29. That at all times hereinafter mentioned, Defendant Q.E.D. RESOURCES, LTD. had a duty to provide security and maintain the safety of their office at the premises.

30. That at all times hereinafter mentioned, Defendant ROBERT WEINER was an employee of Q.E.D. RESOURCES, LTD.

31. At all times hereinafter mentioned, Plaintiff YULONDA HOPSON was an employee of Bernstein & Afra, a sub-tenant in the aforementioned office suite.

32. At all times hereinafter mentioned, from 1986 to 1987 while Plaintiff was employed at the aforementioned premises, she was caused to be sexually molested, harassed and assaulted by Defendant ROBERT WEINER.

33. At all times hereinafter mentioned, Plaintiff was sexually molested, harassed and assaulted by Defendant ROBERT WEINER during Plaintiff's time at work from 1986 to 1987.

34. At all times hereinafter mentioned, Defendant ROBERT WEINER had committed prior acts of sexual harassment and abuse.

35. Defendants, through their agents, servants, representatives and/or employees were negligent, careless, reckless and grossly negligent in the ownership, operation, control, management and lack of supervision of its office at the premises; in failing to exercise reasonable care for the protection and benefit of Plaintiff; in failing to properly supervise their employees, specifically Defendant ROBERT WEINER; in failing to provide competent and adequate personnel to supervise the employees; in failing to perform proper and adequate



background checks on their employees; in failing to take reasonable steps in the supervision, services and care rendered to and on behalf of Plaintiff; in failing to take reasonable steps to provide for Plaintiff's safety; in failing to provide a safe environment for Plaintiff; in failing to protect Plaintiff from their employee making repeated, unwanted sexual advances; in sexually assaulting, harassing and molesting Plaintiff; in ignoring complaints of harassment and assault; in making lewd, sexually suggestive comments to the Plaintiff; in causing, allowing and permitting an unsafe work environment; in failing to provide adequate and proper supervision to their employees, including Plaintiff, despite actual or constructive notice of Defendant ROBERT WEINER's deviant sexual habits and propensities; in failing to properly train its personnel; and in otherwise being negligent, careless and reckless.

36. That the harassment, abuse and resulting injuries were caused solely by the negligence of Defendants, individually and by their agents, servants, employees and/or licensees without any negligence or culpability on the part of Plaintiff contributing thereto.

37. As a result of the foregoing, Plaintiff was caused to sustain serious, protracted permanent injuries, mental anguish, suffered, still suffers and will continue to suffer great pain and mental anguish, was caused to undergo treatment and will continue in the future to require medical care and psychiatric services and related expenses.

38. That Defendants' aforesaid acts and failures were grossly negligent, careless, wanton, willful and constituted a conscious disregard to the safety of Plaintiff, entitling Plaintiff to punitive damages.

39. That as a result of the foregoing, Plaintiff has been injured and damaged in a sum which exceeds the jurisdictional limitations of all lower courts which would otherwise have jurisdiction over this action for compensatory damages and in a sum which exceeds the

jurisdictional limitations of all lower courts which would otherwise have jurisdiction over this action for punitive damages.

**AS AND FOR A SECOND CAUSE OF ACTION**

40. Plaintiff YULONDA HOPSON repeats and realleges each and every allegation contained herein, together with the same force and effect as though same were more fully set forth at length herein.

41. That Defendants QED RESOURCES INC. and Q.E.D. RESOURCES, LTD. knew or should have known of the deviant sexual habits and propensities of Defendant YULONDA HOPSON.

42. That upon information and belief and at all times hereinafter mentioned, Defendants, QED RESOURCES INC. and Q.E.D. RESOURCES, LTD., by their agents, servants, and/or representatives condoned, facilitated and/or permitted the aforesaid sexual assault, rape and molestation, all in violation of the applicable statutory and case law.

43. As a result of the incidents complained of herein, Plaintiff was caused to sustain severe, painful and profound injuries to his mind and body, some of which are permanent and with permanent effects of pain and disability, mental and psychological suffering.

44. That Defendants' aforesaid acts and failures were negligent, grossly negligent, careless, wanton, willful and constituted a conscious disregard to the safety of Plaintiff, entitling Plaintiff to punitive damages.

45. That as a result of the foregoing, Plaintiff has been injured and damaged in a sum which exceeds the jurisdictional limitations of all lower courts which would otherwise have jurisdiction over this action for compensatory damages and in a sum which exceeds the



jurisdictional limitations of all lower courts which would otherwise have jurisdiction over this action for punitive damages.

**AS AND FOR A THIRD CAUSE OF ACTION**

46. Plaintiff YULONDA HOPSON repeats and realleges each and every allegation set forth above with the same force and effect as if more fully set forth at length herein.

47. The acts complained of by Defendants QED RESOURCES INC., Q.E.D. RESOURCES, LTD. and ROBERT WEINER constitute negligent infliction of emotional distress to Plaintiff YULONDA HOPSON.

48. As a result of the incidents complained of herein, Plaintiff was caused to sustain severe, painful and profound injuries to her mind and body, some of which are permanent and with permanent effects of pain and disability, mental and psychological suffering.

49. That the aforesaid acts and failures of the Defendants were negligent, grossly negligent, careless, wanton, willful and constituted a conscious disregard to the safety of Plaintiff, entitling Plaintiff to compensatory and punitive damages.

50. That as a result of the foregoing, Plaintiff has been injured and damaged in a sum which exceeds the jurisdictional limitations of all lower courts which would otherwise have jurisdiction over this action for compensatory damages and in a sum which exceeds the jurisdictional limitations of all lower courts which would otherwise have jurisdiction over this action for punitive damages.

**AS AND FOR A FOURTH CAUSE OF ACTION**

51. Plaintiff YULONDA HOPSON repeats and realleges each and every allegation set forth above with the same force and effect as if more fully set forth at length herein.

52. From 1986 to 1987, Defendant ROBERT WEINER sexually

harassed, groped, assaulted, and molested Plaintiff YULONDA HOPSON.

53. The acts of Defendant ROBERT WEINER constituted sexual assault of the Plaintiff.

54. As a result of the incident complained of herein, Plaintiff was caused to sustain severe, painful and profound injuries to her mind and body, some of which are permanent and with permanent effects of pain and disability, mental and psychological suffering.

55. That the aforesaid acts and failures of Defendant ROBERT WEINER were intentional, negligent, grossly negligent, careless, wanton, willful and constituted a conscious disregard to the safety of Plaintiff, entitling Plaintiff to punitive damages.

56. That as a result of the foregoing, Plaintiff has been injured and damaged in a sum which exceeds the jurisdictional limitations of all lower courts which would otherwise have jurisdiction over this action for compensatory damages and in a sum which exceeds the jurisdictional limitations of all lower courts which would otherwise have jurisdiction over this action for punitive damages.

**AS AND FOR A FIFTH CAUSE OF ACTION**

57. Plaintiff YULONDA HOPSON repeats, reiterates and realleges each and every allegation contained herein, together with the same force and effect as though same were more fully set forth at length herein.

58. At all times herein mentioned, Defendant QED RESOURCES INC. was and is responsible for the hiring, training, supervision, evaluation and retention of its servants, agents and/or employees, including Defendant ROBERT WEINER.

59. At all times herein mentioned, Defendant QED RESOURCES INC. was

responsible for screening and investigating its acting servants, agents and/or employees prior to hiring, as well as during the term of their tenure to update background checks in accordance with stated policies and rules, for prior incidents, criminal history and/or convictions, any propensities for deviant, careless and reckless behavior and general fitness for said position.

60. That Defendant QED RESOURCES INC. knew or should have known of the deviant sexual propensities of their acting agents and/or employees, including Defendant ROBERT WEINER.

61. At all times herein mentioned, Plaintiff was injured and damaged as a result of the negligence, carelessness, recklessness and gross negligence of Defendant ROBERT WEINER, an employee of QED RESOURCES INC.

62. At all times herein mentioned, Defendant Q.E.D. RESOURCES, LTD. was and is responsible for the hiring, training, supervision, evaluation and retention of its servants, agents and/or employees, including Defendant ROBERT WEINER.

63. At all times herein mentioned, Defendant Q.E.D. RESOURCES, LTD. was responsible for screening and investigating its acting servants, agents and/or employees prior to hiring, as well as during the term of their tenure to update background checks in accordance with stated policies and rules, for prior incidents, criminal history and/or convictions, any propensities for deviant, careless and reckless behavior and general fitness for said position.

64. That Defendant Q.E.D. RESOURCES, LTD. knew or should have known of the deviant sexual propensities of their acting agents and/or employees, including Defendant ROBERT WEINER.

65. At all times herein mentioned, Plaintiff was injured and damaged as a result of the negligence, carelessness, recklessness and gross negligence of Defendant ROBERT WEINER,

an employee of Q.E.D. RESOURCES, LTD.

66. The Defendants QED RESOURCES INC. and Q.E.D. RESOURCES, LTD., through their agents, servants, representatives and/or employees were grossly negligent, wanton, reckless and careless in the hiring, supervision, retention and control of their employees; in failing to properly train, screen and supervise its employees, including Defendant ROBERT WEINER; in continuing to employ, retain and engage personnel whom the Defendants knew, or in the exercise of reasonable care, should have known of their acting agents and/or employees' propensities for careless, reckless and sexually deviant behavior; in failing to properly and adequately investigate their employees, including Defendant ROBERT WEINER; in failing to adequately investigate, screen, check the qualifications and run a proper background check on their employees; in failing to monitor the activities of their employees; in failing to terminate their relationship with or fire Defendant ROBERT WEINER and in being otherwise grossly negligent, wanton, reckless and careless.

67. That the incident and resulting injuries were caused solely by the negligence of the Defendants and without any negligence and/or culpable conduct on the part of the Plaintiff.

68. That because of the above stated premises, the Plaintiff was caused to sustain serious physical damages and to have suffered pain, shock, mental anguish; that these injuries and their effects will be permanent; as a result of said injuries plaintiff was caused and will continue to be caused to incur expenses for medical care and attention; and plaintiff was and will continue to be rendered unable to perform plaintiff's normal activities and duties and has sustained a resultant loss therefrom.

69. That the aforesaid acts and failures of the Defendants were grossly negligent, careless, wanton, willful and constituted a conscious disregard to the safety of the plaintiff,



entitling plaintiff to punitive damages.

70. As a result of the foregoing, Plaintiff has been injured and damaged in a sum which exceeds the jurisdictional limitations of all lower courts which would otherwise have jurisdiction over this action for compensatory damages and in a sum which exceeds the jurisdictional limitations of all lower courts which would otherwise have jurisdiction over this action for punitive damages.

**WHEREFORE**, Plaintiff YULONDA HOPSON demands judgment against Defendants on the First Cause of Action in a sum that exceeds the jurisdictional limitations of all lower courts that would otherwise have jurisdiction over this action for compensatory damages and in a sum that exceeds the jurisdictional limitations of all lower courts that would otherwise have jurisdiction over this action for punitive damages; Plaintiff demands judgment against Defendants on the Second Cause of Action in a sum that exceeds the jurisdictional limitations of all lower courts that would otherwise have jurisdiction over this action for compensatory damages and in a sum that exceeds the jurisdictional limitations of all lower courts that would otherwise have jurisdiction over this action for punitive damages; Plaintiff demands judgment against Defendants on the Third Cause of Action in a sum that exceeds the jurisdictional limitations of all lower courts that would otherwise have jurisdiction over this action for compensatory damages and in a sum that exceeds the jurisdictional limitations of all lower courts that would otherwise have jurisdiction over this action for punitive damages; Plaintiff demands judgment against Defendants on the Fourth Cause of Action in a sum that exceeds the jurisdictional limitations of all lower courts that would otherwise have jurisdiction over this action for compensatory damages and in a sum that exceeds the jurisdictional limitations of all lower courts that would otherwise have jurisdiction over this action for punitive damages; Plaintiff demands judgment against Defendants on the Fifth Cause of Action



in a sum that exceeds the jurisdictional limitations of all lower courts that would otherwise have jurisdiction over this action for compensatory damages and in a sum that exceeds the jurisdictional limitations of all lower courts that would otherwise have jurisdiction over this action for punitive damages, together with the costs and disbursements of this action.

Dated: New York, New York  
September 4, 2019

Yours, etc.

CAMPSON & CAMPSON

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By: Paul J. Campson  
Attorneys for Plaintiff  
485 Madison Avenue, Suite 1301  
New York, NY 10022  
(212) 302-1180

ATTORNEY'S VERIFICATION BY AFFIRMATION

[illegible]

I, the undersigned, am an attorney admitted to practice in the Courts of New York State, and say that:

I, Paul J. Campson, am the attorney of record, or of counsel with the attorneys of record, for claimant(s). I have read the annexed COMPLAINT, know the contents thereof and the same are true to my knowledge, except those matters therein which are stated to be alleged on information and belief, and as to those matters I believe them to be true. My belief, as to those matters therein not stated upon knowledge, is based upon the following:

The file maintained in my office and investigation as to the matter.

The reason I make this affirmation instead of plaintiff is that your deponent maintains its office outside the county where the claimant resides.

I affirm that the foregoing statements are true under penalties of perjury.

Dated: New York, NY  
September 4, 2019

PAUL J. CAMPSON